

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER, and  
STEINER ASSOCIATES, LLC,

Plaintiffs,

V.

EBAY INC., et al.

Defendants.

Case No.: 1:21-cv-11181-PBS

**DECLARATION OF CAZ HASHEMI**  
**IN SUPPORT OF DEFENDANT STEVE WYMER'S MOTION TO DISMISS**

I, Caz Hashemi, declare as follows:

1. I am a partner at the law firm of Wilson, Sonsini, Goodrich & Rosati P.C. and am counsel for Defendant Steve Wymer in this matter. I submit this Declaration in support of Mr. Wymer's Motion to Dismiss the First Amended Complaint.
2. Attached as Exhibit A is a true and correct copy of a press release issued by eBay, Inc. dated January 16, 2019 titled "Steve Wymer to Join eBay as Senior Vice President and Chief Communications Officer." The press release is publicly available at <https://www.ebayinc.com/stories/news/steve-wymer-joins-ebay-as-senior-vice-president-and-chief-communications-officer/>. Mr. Wymer has requested that the Court take judicial notice

of Exhibit A for the reasons set forth in Mr. Wymer's Memorandum of Law in Support of Motion to Dismiss, filed herewith.

3. Attached as Exhibit B is a true and correct copy of the transcript from Jim Baugh's September 29, 2022 sentencing hearing, entered as ECF No. 239 in the criminal case captioned *United States v. Baugh, et al.*, 20-10263-PBS in this District. Mr. Wymer has requested that the Court take judicial notice of Exhibit B for the reasons set forth in Mr. Wymer's Memorandum of Law in Support of Motion to Dismiss, filed herewith.

I declare under the penalty of perjury that the foregoing is true and correct and that this declaration was completed on this 21st day of April, 2023.

/s/ Caz Hashemi  
Caz Hashemi

**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2023, a true and correct copy of the foregoing pleading was filed with the Clerk of Court and served upon all attorneys of record via the Court's ECF system.

Dated: April 21, 2023

/s/ Michael J. Pineault  
Michael J. Pineault